

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DARRELL F. HAMM and	:	CHAPTER 13
HOLLY A. HAMM	:	
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
DARRELL F. HAMM and	:	
HOLLY A. HAMM	:	
Respondent(s)	:	CASE NO. 1-18-bk-02340

OBJECTION TO DEBTORS' EXEMPTIONS

AND NOW, this 9th day August, 2018, comes Charles J. DeHart, III,
Standing Chapter 13 Trustee, and objects to the debtors' exemptions for the following reason(s):

1. Trustee objects to debtors' exemption of assets claimed under 11 U.S.C. §522(d)(2).
2. Debtor(s) exemption of 100% of Fair Market Value without proof of the asset's value deprives unsecured claimants of the asset's value to the estate if it was liquidated under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's
Objection to Debtors' Exemptions.

Respectfully submitted,

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

CERTIFICATE OF SERVICE

AND NOW, this 13th day August, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Hyams, Esquire
2023 N. 2nd Street, Suite 203
Harrisburg, PA 17102

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee